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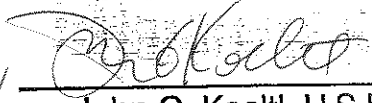
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LATHAM & WATKINS LLP

**APPLICATION GRANTED
SO ORDERED**

April 19, 2021

VIA ECF

4/19/21 - 
John G. Koeltl, U.S.D.J.

Honorable John G. Koeltl
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

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Re: **United States v. Hayes et al., No. 20 Cr. 500 (JGK)**

Dear Judge Koeltl:

We respectfully submit this letter on behalf of our client Samuel Reed for leave to file a redacted set of Exhibits A-G (the "Exhibits"), which were cited in but not filed with Mr. Reed's April 1, 2021 letter to the Court (ECF No. 42). The government has requested redactions to the Exhibits, and we have applied the redactions requested by the government.

The government has asked us to inform the Court that it requests these redactions on the basis that the redacted information:

1) identifies or describes material produced by the Government as Confidential under the terms of this Court's Protective Order, Dkt. No. 23; 2) identifies or describes material produced by the Government as Sensitive under the terms of this Court's Protective Order; or 3) refers to a separate and ongoing investigation wholly unrelated to the Government's investigation underlying the Indictment.

As this Court found in its Protective Order, the Confidential material "(i) contains information that affects the privacy, confidentiality, and business interests of individuals and entities; (ii) would risk prejudicial pretrial publicity if publicly disseminated; and (iii) would impede, if prematurely disclosed, the Government's ongoing investigation." Protective Order ¶ 2. The Sensitive material contains "information that identifies, or could lead to the identification of, witnesses whose identifying information the Government wishes to maintain as confidential based on the protective considerations set forth herein." Protective Order ¶ 3. The Government respectfully requests redactions of the identities of individuals and entities whose information has been marked as Confidential or Sensitive on the same basis: public disclosure of these identities would itself affect their privacy, confidentiality and business interests; risk prejudicial publicity; or impede the Government's ongoing investigation. Similarly, the Government requests

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redaction of information related to a separate and ongoing investigation totally unrelated to the Indictment.

* * *

We are available at the Court's convenience to discuss any questions about this request. The Government has asked us to inform the Court that it is also available at the Court's convenience to discuss any questions. Thank you.

Respectfully submitted,

/s/ Douglas K. Yatter
Douglas K. Yatter
Benjamin Naftalis
of LATHAM & WATKINS LLP

cc: All Counsel of Record (via ECF)